



**Service of Process
Transmittal**

09/17/2019

CT Log Number 536265971

TO: KIM LUNDY SERVICE OF PROCESS
WALMART INC.
702 SW 8TH ST, MAILSTOP 0215
BENTONVILLE, AR 72716-6299

RE: Process Served in Virginia

FOR: Wal-Mart Stores East, LP (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Henderson Tonya, Pltf. vs. Wal-Mart Stores East, LP, Dft.

DOCUMENT(S) SERVED: Summons, Complaint

COURT/AGENCY: Fairfax County Circuit Court, VA
Case # CL20190012430

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition - 10/7/2017

ON WHOM PROCESS WAS SERVED: C T Corporation System, Glen Allen, VA

DATE AND HOUR OF SERVICE: By Process Server on 09/17/2019 at 09:30

JURISDICTION SERVED : Virginia

APPEARANCE OR ANSWER DUE: Within 21 days after such service

ATTORNEY(S) / SENDER(S): Thomas B. Morrison
3930 Walnut Street, Suite 250
Fairfax, VA 22030
(703) 273-1133

ACTION ITEMS: CT has retained the current log, Retain Date: 09/18/2019, Expected Purge Date:
09/23/2019

Image SOP

Email Notification, KIM LUNDY SERVICE OF PROCESS ctlawsuits@walmartlegal.com

SIGNED: C T Corporation System

ADDRESS: 1999 Bryan St Ste 900
Dallas, TX 75201-3140

For Questions: 877-564-7529
MajorAccountTeam2@wolterskluwer.com

COMMONWEALTH OF VIRGINIA
CIRCUIT COURT OF FAIRFAX COUNTY
4110 CHAIN BRIDGE ROAD
FAIRFAX, VIRGINIA 22030
703-691-7320
(Press 3, Press 1)

Tonya Henderson vs. Wal Mart Stores East LP

CL-2019-0012430

**TO: Wal Mart Stores East LP
Serve: Registered Agent
4701 Cox Road Suite 285
Glen Allen VA 23060**

SUMMONS – CIVIL ACTION

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the Clerk's office of this Court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment or decree against such party either by default or after hearing evidence.

APPEARANCE IN PERSON IS NOT REQUIRED BY THIS SUMMONS.

Done in the name of the Commonwealth of Virginia, on September 10, 2019.

JOHN T. FREY, CLERK

By 

Deputy Clerk

Plaintiff's Attorney: Thomas B. Morrison

FILED
CIVIL INTAKE
2019 SEP -9 PM 1:30
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

TONYA HENDERSON

Plaintiff,

v.

Case No. **2019 12430**

WAL-MART STORES EAST, LP

Serve: Registered Agent

4701 Cox Road, Suite 285

Glen Allen, VA 23060

Defendant.

COMPLAINT

Plaintiff, by counsel, sues the Defendants and in support thereof alleges as follows:

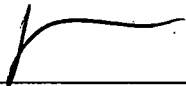
1. The Plaintiff is an adult resident of Fairfax County, Virginia.
2. The Defendant owns and operates a Wal-Mart Store located in the Kingstowne area of Fairfax County, Virginia.
3. On or about October 7, 2017, Plaintiff was shopping at the Wal-Mart Store located on Kingstowne Boulevard in Fairfax Virginia. Plaintiff was entering the store at approximately 7:30 a.m. and was between the two entrance doors when she slipped on water, which had been allowed to accumulate on the floor, injuring herself. At the time of the incident, there were no "wet floor" signs, mats or any other protection for persons entering the store.
4. The Defendant owed a duty to its business invitees, such as the Plaintiff, to use reasonable care to insure that no such defects existed, to remedy such defect, or to warn the users of the store of those defects which they knew or should have known of, but could not correct. In this case, the Defendants failed in that duty to the Plaintiff.
5. As a result of their breach of duty, the Defendant and its employees were negligent. Such negligence was the cause of the Plaintiff's injuries.

5. As a result of their breach of duty, the Defendant and its employees were negligent. Such negligence was the cause of the Plaintiff's injuries.

6. As a result of Defendant's negligence, Plaintiff suffered severe and permanent bodily injury. Plaintiff has had lost income in the past and will have lost income in the future; Plaintiff has had pain and suffering in the past and will have pain and suffering in the future; and Plaintiff incurred medical and will incur medical bills in the future.

WHEREFORE, Plaintiff demands judgment against the Defendant in the amount of THREE HUNDRED THOUSAND DOLLARS (\$300,000.00) plus prejudgment interest from October 7, 2017 to date and the costs of this action.

Respectfully submitted,



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